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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

HAKKASAN Limited, a United Kingdom
limited liability company,

Plaintiff,

vs.

KILO CLUB, LLC, a Nevada limited
liability company,

Defendant.

Case No. 2:22-cv-01695-APG-EJY

STIPULATION AND PROPOSED ORDER TO
EXTEND DISCOVERY DEADLINES

[SECOND REQUEST]

Plaintiff HAKKASAN LIMITED (“Hakkasan”), by and through its counsel, the law firm of Greenberg Traurig, LLP, and Defendant KILO CLUB, LLC, by and through its counsel, FisherBroyles, LLP, hereby stipulate to extend remaining discovery deadlines by sixty (60) days. This is the second stipulation to extend these deadlines.

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Specifically, the parties are in the process of finalizing settlement documents and collecting signatures. However the process has been delayed because the principal for Defendant is currently out the country. As such, to conserve the parties' resources that would be immediately incurred with depositions and retaining expert expenses, the parties hereby stipulate to a 60-day extension of the remaining discovery deadlines. Pursuant to LR 26-3, the parties state as follows:

A. A Statement Specifying the Discovery Completed.

The parties have exchanged initial disclosures. Hakkasan has served one round of written discovery, which includes requests for admissions, interrogatories, and requests for production of documents. Kilo Club has not responded to this written discovery.

B. A Specific Description of the Discovery That Remains to be Completed.

This matter is relatively early in the discovery process; nearly four months remain in the overall discovery period. If this case is not resolved, the parties anticipate completing written discovery and taking depositions of relevant witnesses including the deposition of Jea Jung, and retaining experts and taking expert depositions.

C. The Reasons Why the Deadline was Not Satisfied.

The parties recently stipulated to (and this Court then ordered) an extension of deadlines to focus on settlement. The parties did not take any discovery during that time as they were focused on finalizing and documenting their agreement. This further extension would allow that process to continue and account for any delays relating to the upcoming holidays.

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D. A Proposed Schedule for Completing All Remaining Discovery.

The parties propose the following deadlines:

EVENT	CURRENT DEADLINE	NEW DEADLINE
Amendment of Pleadings and Adding Parties	September 13, 2023	CLOSED
Expert Disclosure	December 12, 2023	February 10, 2024
Rebuttal Expert Disclosure	January 12, 2024	March 12, 2024
Close of Discovery	February 12, 2024	April 1, 2024
Dispositive Motions	March 11, 2024	May 10, 2023

This stipulation is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 21st day of November, 2023.

GREENBERG TRAURIG, LLP

/s/ Kara B. Hendricks

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Counsel for Plaintiff Hakkasan Limited

DATED this 21st day of November, 2023.

FISHERBROYLES LLP

/s/ Rob L. Phillips

Rob L. Phillips, Esq.
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3753 Howard Hughes Parkway
Suite 200
Las Vegas, Nevada 89169
Counsel for Defendant Kilo Club LLC

IT IS SO ORDERED.

Rayna J. Zouchak
UNITED STATES DISTRICT JUDGE

DATED: November 21, 2023